

SIGNIFICANT ISSUE COMMENT CLARIFICATIONS REGARDING EPA'S FS SECTIONS 3 AND 4

The Lower Willamette Group's (LWG) Significant Issues (SI) comments on Feasibility Study (FS) Sections 3 and 4 were submitted to the Environmental Protection Agency (EPA) on September 8, 2015. This memorandum contains corrections and clarifications to the September 8, 2015 SI comments as follows:

- SI comment 1e indicates that the LWG has prepared alternate technology decision trees, which can be provided to facilitate discussions of Proposed Plan contents and Record of Decision (ROD) requirements. To clarify, the LWG is continuing to evaluate ways to express a more technically appropriate technology assignment process using flow charts, descriptive text, or other tools, as necessary. The LWG may provide additional comments on EPA's decisions trees, the technology assignment process in general, or a proposal for an alternate technology assignment process for the FS, Proposed Plan, or ROD. This clarification does not change the conclusion of the comment.
- SI comment 1f indicates that EPA assumed that 2.5% of the dredged material concentration would remain in the post-dredge surface for long-term effectiveness evaluations. To clarify, this statement is based on information contained in EPA's Appendix H. This clarification does not change the conclusion of the comment.
- SI comment 3a at the top of page 10 indicates that the osprey egg endpoint was assessed in the Baseline Ecological Risk Assessment (BERA) on a Site-wide spatial scale. This is incorrect and this sentence can be deleted from the comment. This revision does not change the conclusion of the comment.
- SI comment 5a indicates that EPA assumed that trucks will transport dredged sediments from the transload facility to the landfills. Based on further review of Appendix G, it appears that EPA assumed that trucks would transport materials to the Subtitle C landfill and that trains would transport material to the Subtitle D landfill in Washington State. This revision does not change the conclusion of the comment that there would be a substantial increase in truck traffic for all of the alternatives.
- SI comment 5c indicates that EPA did not include a dredging efficiency factor in the FS dredging production rates. Upon further review of EPA's 2013 dredge production memorandum, it appears that EPA did include a dredging efficiency factor in portions of the calculations. The July 29, 2015 supplemental dredging information from EPA appears to use a dredging efficiency of 62.5% when calculating a theoretical production rate for cable arm buckets. For articulated arm buckets EPA appears to use the production rate observed on the Boeing Plant 2 work on the Duwamish River, which implies that EPA assumed the same efficiency would occur in Portland Harbor as well. The first paragraph of this comment should be revised to read: "EPA does not discuss or appear to include any time for preparation of dredging areas (e.g., placement and removal of silt curtains and, particularly, sheetpile walls) and placement of post-dredge sand covers (which EPA notes should be conducted immediately after dredging to reduce contaminant release rates). Also, EPA assumes that dredging will occur through the entire 123 days of the available construction window, while the 2012 draft FS excludes

Sundays and three Federal holidays to arrive at 104 total possible construction days. The Duwamish FS also considered days off for holidays, downtime to accommodate associated construction like piling and dock work, weather and other delay days, and a period at the end of each construction window without dredging activity to allow for time to place capping, backfill, and EMNR materials. EPA's FS text addresses none of these issues." This revision does not change the conclusion of the comment.

- Similarly, SI comment 10b.ii mentions the dredging efficiency factor as an example. This example should be deleted for the reasons stated above. This revision does not change the conclusion of the comment.
- SI comment 16a indicates additional information can be found in "Section 3 significant issues." To clarify, this text should be revised to read "Comment 19." This revision does not change the conclusion of the comment.
- SI comment 16f.ii indicates that EPA's mobilization/demobilization factor of 1.6% is "unexplained." Upon further review of Appendix G, it appears that EPA obtained this factor from the Duwamish FS. This revision does not change the conclusion of the comment.
- SI comment 16f.viii indicates that EPA did not appear to use the cost sensitivity analysis in the Section 4 main text. To clarify, the first sentence of this comment should be revised to read: "EPA conducted a cost sensitivity analysis. Although it is discussed at the very end of Section 4, it is not mentioned and does not appear to factor into the earlier alternative evaluation discussions." This revision does not change the conclusion of this comment.
- SI comment 17c.viii indicates, as an example, that the spatial scale of the osprey egg assessment in the BERA was Site-wide. This is incorrect. The example should be deleted, and this revision does not change the conclusion of the comment.
- SI comment 19p states, "dredging efficiency (see Comment 5c)." This text should be deleted for reasons noted above. This revision does not change the conclusion of the comment.